Loyola Tutoring
PRIVACY POLICY

www.loyolatutoring.org is operated by Loyola Tutoring Pty Ltd (ACN 634 246 245) as trustee for the Loyola Family Trust (trading as Loyola Tutoring) (referred to in this Privacy Policy as "**Loyola Tutoring"**, "**we**", **"We**", "**us**", "**Us"**, "**our**" or "**Our**"). We recognise the importance of protecting the privacy and the rights of individuals in relation to their personal information.

By using or subscribing to our website, registering an account with us or entering into an agreement with us for services, you are accepting the terms of this privacy policy, and you are consenting to our collection, use, disclosure, retention and protection of your personal information as described in this privacy policy.

We appreciate that your privacy is important to you. We will continue to protect the personal information you provide us and we will manage your personal information in accordance with any mandatory privacy regulations.

We will take all reasonable steps to ensure that all information we collect, use or disclose is accurate, complete, up-to-date and stored in a secure environment.

1. Purpose

1.1. This privacy policy (**Privacy Policy**) applies to personal information collected by Loyola Tutoring, which outlines how we use, keep secure and disclose personal information.

1.2. The Privacy Policy outlines:

(a) how and when Loyola Tutoring collects personal information;

(b) how Loyola Tutoring uses and discloses personal information;

(c) how Loyola Tutoring keeps personal information secure, accurate and up-to-date;

(d) how an individual can access and correct their personal information; and;

(e) how Loyola Tutoring will facilitate or resolve a privacy complaint.

1.3. We recommend that you read and understand this Privacy Policy and keep it for future reference. If you require any clarification, you can contact us- our contact details are included at paragraph 10 of this Privacy Policy.

1.4. Loyola Tutoring takes your privacy seriously. In dealing with personal information, we comply with the relevant principles in the *Privacy Act 1988* (Cth) (**Privacy Act**).

1.5. Information directly from you

(a) Loyola Tutoring tries to collect personal information about you directly from you. If we collect details about you from someone else, we will make you aware that we have done this and the reason for it.

(b) We primarily collect information about you when you use or request our services, or when you communicate with us by email, telephone, in writing or in person.

(c) We also collect information about you if you are providing services to us or if you apply for employment with us.

(d) As far as possible or unless provided otherwise under this Privacy Policy, we will collect your personal information directly from you.

(e) Depending upon the reason for requiring the information, some of the information we ask you to provide may be identified as mandatory or voluntary. If you do not provide the mandatory data or any other information we require in order for us to provide our services to you, we may be unable to provide or effectively provide our services to you.

1.6. Information collected by our websites

(a) When you visit our website, our web server may request your browser to create a cookie on your computer. A cookie is a small piece of information sent by our server to your browser by other sites.

(b) Our cookies do not contain personal information about users. However, cookies can identify a user's browser. The cookies transferred by our website are used for such things as capturing information about a user's web browser, controlling a pop-up window or enabling login access to password protected areas of the website.

(c) Our analytics systems use cookies to gather information regarding visitor activity to our websites. This is not used to identify you as an individual but is collated into aggregate results or classifications.

(d) Third parties may also use their own cookies to collect non-personal information about your activities on our website. This information, which may be combined with information acquired from third parties, may be used to serve you promotional material that we believe you might be interested in based on the content you have viewed.

(e) The cookies placed by third parties are subject to the privacy policies of these third parties. Loyola Tutoring has no control over these cookies.

(f) If you do not wish to receive any cookies, you may set your browser to refuse

them; go to the browser's help menu for instructions. Please note that some features of the Loyola Tutoring website may not work if cookies are disabled.

1.7. Site User Tracking Experience

(a) We may use tracking software to review and improve your experience of our website.

(b) We may use advertising products, such as Facebook, search and display advertisement with Google or other social media channels and through visits to our website, user browsing data maybe collected.

(c) Data collected via these Google products is not linked with any personally identifiable information you submit while on our website. If you wish to opt out of the Google data collection, you may do so on Google's site.

2. Why do we need to collect personal information?

2.1. We collect personal information when you volunteer that information in order to receive a service from us or through our website. The personal information collected by us or on our websites will be used to provide the services you have requested, such as setting up and managing your subscription or account on our website. Your personal information may be used in relation to any survey, promotional offer or any competition you may enter on our website.

3. What information do we collect?

3.1. The personal information we may collect includes your name, postal address, email address, telephone numbers and contact details, information for identification purposes, profession or occupation, business or company numbers and names. If you make payments from our website by credit card or debit card or direct debit from your bank account, we may collect your card or bank account details.

3.2. The “cookies” are used to follow the pattern of movements of users by letting us know which pages on our websites are visited. The anonymous non-personal information that we collect and analyse in not personal information.

3.3. Any additional personal information relating that you may provide to us directly through our website.

3.4. Sensitive information is a subset of personal information. Under the Privacy Act and the Australian Privacy Principles, higher standards apply to information classified as sensitive information. It is information that is considered sensitive and can include:

(a) information or opinion about an individual’s racial or ethnic origin;

(b) health or medical information;

(c) genetic information and biometric information;

(d) family health and medical history,

but only if the sensitive information is necessary for, or incidental to, the purposes of collection set out in paragraph 6.

3.5. In general, we attempt to limit the collection of sensitive information we may collect but depending how you use our services this may not always be possible, and we may collect sensitive information to carry out the services provided to you, and where you have consented and agreed to the collection of such information. We will obtain your consent at (or around) the point in time in which we collect the information unless consent is not required by law.

3.6. Any sensitive information will only be accessible by restricted staff within Loyola Tutoring and will only be disclosed to an entity (generally the relevant regulatory or government authority or agency) where we have a legal or regulatory requirement or obligation to do so or with your express consent.

3.7. We will also only deal with any sensitive information that is classified as medical records in accordance with any relevant medical records legislation that applies.

4. How do we store your information?

4.1. Although we cannot guarantee the safety or security of your personal information, we take reasonable physical, electronic, and procedural measures to protect your personal and sensitive information against loss or unauthorised access, use, interference, modification, or deletion.

4.2. We use different technologies and procedures to help protect personal information from unauthorised access, loss, alternation, disclosure or use. Some of the safeguards we use are physical access controls, information firewalls and access authorisation controls to where your personal information is held in data centres. Our commitment to data security means:

(a) we have procedures to limit access to personal information within our business;

(b) we use security measures and technologies within our business to protect your personal information; and

(c) we use service providers that can establish that they have secure controls relating to software security, access security and network security, including where credit card information is being transferred.

4.3. [Our website is hosted in Australia]. In addition, web traffic information we collect, such as data collected by Google Analytics may be stored overseas*.*

5. Retention of your personal information

5.1. We will retain your personal information only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your personal information to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

6. What use do we make of your personal information?

6.1. We may use your personal information to, and you consent to us using your personal information to:

(a) if required, for the verification of your identity, including the verification of your date of birth, if applicable;

(b) provide our services to you, which shall include but is not limited to:

(i) the administration and management of our services, including charging, billing, credit card authorisation and verification, fraud and collecting debts; and

(ii) to offer you updates, or other content or products and services provided by us that may be of interest to you;

(c) conduct evaluations of our services;

(d) subject to your express consent, publish success stories based on the services we have provided;

(e) contact individuals for feedback on our services; and

(f) assist us to perform our corporate and contractual obligations.

6.2. We may also use or disclose your personal information and in doing so we are not required to seek your additional consent:

(a) when it is disclosed or used for a purpose related to the primary purposes of collection detailed above and you would reasonably expect your personal information to be used or disclosed for such a purpose (secondary use);

(b) if we reasonably believe that the use or disclosure is necessary to lessen or prevent a serious or imminent threat to an individual's life, health or safety or to lessen or prevent a threat to public health or safety;

(c) if we have reason to suspect that unlawful activity has been, or is being, engaged in; or

(d) if it is required or authorised by law or formally requested by a statutory or regulatory authority.

6.3. We will communicate with you in relation to the services we provide, the management of your account and profile.

6.4. We may send you information and updates about any other product, service or information

that we provide to our customers. We may also send you occasional company news and information about other products and services or special promotional offers of our affiliated companies. If at any time you would like to stop receiving future commercial messages from us, we include detailed unsubscribe instructions at the bottom of each email.

6.5. We may also release your personal information when we believe release is appropriate to comply with the law, enforce our subscription agreements, website policies and terms & conditions, or protect ours or others rights, property, or safety.

7. Disclosure

7.1. We may disclose your personal information to:

(a) our directors, employees, agents, contractors or service, debt collectors, professional advisors for the purposes of operating our website or our business, fulfilling requests by you, and to otherwise provide services to you;

(b) suppliers and other third parties with whom we have commercial relationships, for business, marketing, and related purposes, which may include overseas parties;

(c) any other organisation for any authorised purpose with your consent; and

(d) circumstances where we have statutory obligations or are otherwise required to do so by law, a court or a government department.

7.2. Direct Marketing

(a) You expressly consent to us using your personal information, including any email address you give to us, to provide you with information and to tell you about our products, services or events or any other direct marketing activity (including third party products, services, and events) which we consider may be of interest to you.

(b) If at any time, you do not wish to receive any further direct marketing communications from us, you may ask us not to send you any further information about products and services and not to disclose your information to other organisations for that purpose. You may do this at any time by using the "unsubscribe" facility included in the email or by contacting us via the details set out at the end of this document.

(c) If we use your personal information for direct marketing, we will ensure we comply with our obligations under the *Do Not Call Register Act 2006* and the *Spam Act 2003*.

(d) We do not use sensitive information to send you direct marketing communications without your consent.

8. How can I access the personal information that you collect?

8.1. We are happy to provide you with details of personal information held about you. To access

this information, you need to email or write to us using the contact details below.

8.2. If you believe that your personal information has been misused, you can inform us of your complaint by writing to our address and we will attempt to resolve the matter.

9. Complaint procedure

9.1. You are entitled to have access to any personal information relating to you which you have previously supplied to us over this website. You are entitled to edit or delete such information unless we are required by law to retain it.

9.2. If you have a complaint concerning the manner in which we maintain the privacy of your personal information, please contact us as set out below. All complaints will be considered by us and we may seek further information from you to clarify your concerns. If we agree that your complaint is well founded, we will, in consultation with you, take appropriate steps to rectify the problem. If you remain dissatisfied with the outcome, you may refer the matter to the external body appropriate to your circumstances depending on your location.

10. Contact us

10.1. If you have any questions or complaints about this Privacy Policy, please contact us via loyolatutoring@gmail.com

10.2. We will treat your requests or complaints confidentially.

10.3. Our representative will contact you within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved.

10.4. We will aim to ensure that your complaint is resolved in timely and appropriate manner.

11. Changes to our privacy policy

11.1. If we decide to change this Privacy Policy, we will post those changes on this page, and update the Privacy Policy modification date below.

11.2. This Privacy Policy was last modified on **26 November 2021**.

12. Consent

12.1. You agree to the terms of this Privacy Policy when you continue to use our website or by accepting the terms of our terms and conditions of our services, which refer to this Privacy Policy.

12.2. We reserve the right to modify the Privacy Policy as our business needs require. We will notify you of such changes (whether by direct communication or by posting a notice on our website), after which, your continued use of our products, services or website or your continued dealings with us shall be deemed to be your agreement to the modified terms. If you do not agree to our continued use of your personal information due to the changes in our privacy policy, please contact us via the details set out at the end of this document.